



Fw: Re:
Felix Locicero to: Antony Tseng, Rosella OConnor

02/14/2012 08:41 AM

History: This message has been replied to.

You got Barbara's reply. Sounds like she blew off both approaches. Can we all talk to Barbara at 3:00 today?

Antony, are you using the corrected PAT tool? If not speak to Robin about getting the corrected PAT tool and make sure Barbara gets it too.

This is where we miss Kevin. NJDEP's mid management is not going to listen to us or Robin but they may have listened to Kevin.

We are making the Boundary condition issue too big of a issue.

If we assume that the Passaic TMDL will meet the upstream standards for the freshwater pathogen, can we estimate the corresponding concentration of enterococci? If we can we should set the boundary conditions at that number and let NJDEP make the Passaic TMDL meet the upstream standards. If that means more reduction in the Passaic so be it!

We need to talk pick a time before and lets use Rosella's conference line 3:00. Rosella you be conference lead. We will do the same with Barbara this afternoon.

Thanks

Felix

----- Forwarded by Felix Locicero/R2/USEPA/US on 02/14/2012 08:03 AM -----

From: "Barbara Hirst" <Barbara.Hirst@dep.state.nj.us>
To: Felix Locicero/R2/USEPA/US@EPA
Cc: Rosella OConnor/R2/USEPA/US@EPA, Antony Tseng/R2/USEPA/US@EPA
Date: 02/14/2012 07:50 AM
Subject: Re:

A geomean-like boundary can be derived from the Stevens work, which is not complete yet. We have not been able to craft an acceptable scenario that meets standards. Until we are able to do that, I don't believe we can use that work to drive the Passaic boundary. A further issue is that we must be consistent in our hydrology assumption; that means it is not okay to use conc/load data from a year that is not consistent with our design hydrology or worse to mix values from many years. This is the problem I had with the original proposal for contriving a geomean input. How quickly can Anthony test the sensitivity to boundary assumption for all three boundaries? Can he see what would happen if 104 and 0 are the steady inputs to compare to 35? One note: the original PAT tool was flawed, so he needs to be sure he is using the corrected one. Helen does not believe we received the corrected tool. Can we get a copy of that to play with too? I am available around 3 to discuss if you are available.

>>> Felix Locicero <Locicero.Felix@epamail.epa.gov> 2/14/2012 6:52 AM >>>
Barbara,

It is obvious from our call yesterday that the decision to move forward in the pathogen TMDL is not going to be resolved at our level. To get our management to come to agreement, I think we must be in agreement first, so that we are bringing the same message to our policy makers.

Robin, Rosella, Antony and I discussed the option available for addressing boundary load variability.

We know that sufficient data are not available to establish variable boundary conditions for the hydrologic years 2000 - 2003, so we have to use more recent data.

We see two options.

1. Use the available data and the recent data collected by Stevens to establish a variable boundary load. It is my understanding that the use of recent data that may support this approach. Please forward the Stevens data to EPA ASAP.

2. You had indicated that the Stevens model calibration report would be completed by the end of February 2012. Is that time frame still accurate? If so, Robin has indicated that she may be able to adjust the boundary loads to reflect the Stevens model output. I will only be able to sell this approach to my management if the Stevens report will be available by the end Feb or early March.

Antony is going to use the PAT tool to get an idea of how sensitive the downstream waters of the Hackensack and Passaic rivers are to the upstream boundary.

If we can agree that one of the above approaches is acceptable to us, we would brief Jeff and if he agrees on the approach we would ask him to call Jill prior to your Feb 23 meeting and propose that your management consider the agreed upon approach. Maybe if we can come to agreement and support the same approach in discussions with our management we can get their buy in.

I am in the office and available to discuss the above all day except for 10:00 - 11:00.

Felix